

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

IAN WOOD

Defendant.

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) No. 4:23CR551 MTS
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DEFENDANT'S SENTENCING MEMORANDUM

COMES NOW, Defendant Ian Wood, and hereby respectfully requests this Honorable Court impose a sentence of 180 months as required by the mandatory minimum for Mr. Woods' first count of conviction. Said sentence will meet the sentencing objectives before this Court by reflecting the seriousness of the offense and providing just punishment while also accounting for Mr. Wood's history and characteristics.

The Probation Office indicated in paragraph 124 of the Presentence Investigation Report several factors that support a variance from Mr. Wood's advisory guideline range. While this is a very serious offense, it is his first criminal conviction and first time he's ever been in custody. 180 months is a significant incarceration term that will provide the necessary punishment and reflect the seriousness of the offense. Mr. Wood took responsibility for his conduct as soon as he was confronted by law enforcement and was cooperative with investigators in obtaining evidence. Additionally, Mr. Wood's

conduct was not ongoing at the time law enforcement arrested and questioned him. He even indicated in his interview that he was proactively seeking medication to assist in suppressing his urges to ensure that he did not continue to victimize others.

Mr. Wood is in desperate need for counseling and rehabilitation based on his previous traumatic experiences outlined in the Presentence Report. His proactiveness and attempts at preventative medication and therapy is demonstrative of Mr. Woods' amenability to rehabilitation and acceptance of responsibility. 180 months in the Bureau of Prisons will provide an ample opportunity for Mr. Woods to engage in treatment, and the term of supervision to follow with oversight and limitations over Mr. Woods' electronic devices will ensure the protection of the community.

WHEREFORE, for the foregoing reasons Mr. Wood respectfully requests a sentence of 180 months.

Respectfully submitted,

/s/Kayla L. Williams
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jillian Anderson, Assistant United States Attorney.

/s/Kayla L. Williams
KAYLA L. WILLIAMS, #67054MO
Assistant Federal Public Defender